

Via electronic filing

October 15, 2010

Ms. Marlene H. Dortch, Secretary **Federal Communications Commission** Office of the Secretary 445 12th Street, SW Washington, D.C. 20554

Re: Notice of Ex Parte, PS Docket Nos. 10-92, 10-93, 10-146 and GN Docket No. 09-51

Creation of a Cybersecurity Roadmap / National Broadband Plan - Request for Comments

Dear Ms. Dortch:

Pursuant to 47 C.F.R. § 1.1200, et seq., on October 19, 2010, the Online Trust Alliance (OTA) provided members of the Federal Communications Commission ("Commission") with an ex parte discussion in regard to the abovereferenced proceedings. On behalf of OTA, Craig Spiezle, Executive Director and Board member Tim Rohrbaugh Chief Information Security Officer of Intersections, met with Jeffery Goldthorp, Laruen Kravetz and Jane Kelly, of the Public Safety and Homeland Security Bureau.

During the course of the meeting, OTA reviewed its submission dated October 15th and was asked a number of questions about various cybersecurity issues, potential role of the FCC and steps Internet Service Providers, Carriers and consumers can take to mitigate threats to their security and privacy. Key points included:

- Need for ISPs to adopt "best practices", report and share lessons learned with peers to promote adoption.
- Importance of the adoption of DNSSEC.
- Need to include privacy and data collection safeguards in security measures and ISP business practices, including clear and discoverable notices.
- Adoption of both outbound AND inbound email authentication.
- Extend security measures to include the detection of out of date and end-of-life browsers, applications and ad-ons with known vulnerabilities.
- Education to focus on time of data collection and teachable moments.
- Enhance account and password management process and systems to minimize risk of account takeovers.

Respectfully,

Craig Spiezle **Executive Director** Online Trust Alliance

Craig D. Spigle